

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID ANTONIO TICAS,

Defendant.

Case No. 1:21-CR-00601-JDB

**EX PARTE APPLICATION FOR RETURN OF PASSPORT**

Defendant David Antonio Ticas, by and through his attorney of record, Deputy Federal Public Defender Lisa LaBarre, hereby moves the Court for an order directing the United States Pretrial Office for the Northern District of Georgia to release Mr. Ticas's passport. This application is based upon the attached declaration of counsel.

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: October 24, 2022

By */s/ Lisa LaBarre*

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LISA LABARRE  
Deputy Federal Public Defender  
(California Bar No. 246429)  
312 E. 2nd Street  
Los Angeles, CA 90012  
Telephone: (213) 894-2854  
(E-Mail: Lisa\_Labarre@fd.org)

**DECLARATION OF LISA LABARRE**

I, Lisa LaBarre, declare:

1. I am an attorney with the Office of the Federal Public Defender for the Central District of California. I am licensed to practice law in the State of California and I am admitted to practice in this Court. I am counsel of record for David Antonio Ticas.

2. On September 23, 2021, Mr. Ticas was arrested in the Central District of California on a warrant from the United States District Court for the District of Columbia. He made his initial appearance before this Court the same day. He was released that same day on conditions, including the condition that his passport be surrendered to the United States Pretrial Office in the Northern District of Georgia no later than September 30, 2021. Exhibit A.

3. On September 28, 2021, Mr. Ticas surrendered his passport to the United States Pretrial Office in the Northern District of Georgia. Exhibit B.

4. Mr. Ticas was sentenced in this matter on July 15, 2022, and was ordered to serve 14 days of imprisonment. Mr. Ticas has served his term of incarceration and was released on September 23, 2022. Exhibit C. Mr. Ticas is presently on probation, with supervision out of the Northern District of Georgia.

5. I am informed and believe that the Pretrial Office in the Northern District of Georgia will not return Mr. Ticas's passport to him absent a court order. For these reasons, I ask that the Court issue an order to release Mr. Ticas's passport to him.

6. On October 13, 2022, I communicated with AUSA Andrew Tessman, who informed me that his office would defer to the Probation Office on this issue.

7. On October 19, 2022, United States Pretrial Officer for the Northern District of Georgia Natasha Latimore stated that Mr. Ticas will need to reach out to the District of Columbia for the return of the passport. As of the time of this filing, Ms. Latimore did not return follow up messages asking for clarification.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 24, 2022, at Los Angeles, California.

*/s/ Lisa LaBarre*

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LISA LABARRE, DFPD